TAB

TASK FORCE REPORT ON

Records Management

Appendix C

PREPARED FOR

THE COMMISSION ON ORGANIZATION
OF THE EXECUTIVE BRANCH
OF THE GOVERNMENT

January 1949

Records Management in the United States Government

A REPORT WITH RECOMMENDATIONS

PREPARED FOR

THE COMMISSION ON ORGANIZATION OF THE

EXECUTIVE BRANCH OF THE GOVERNMENT

by

Emmett J. Leahy, Executive Director, National Records Management Council. Consultants to the Commission and the Council: Herbert E. Angel, Department of National Defense; Robert H. Bahmer, Assistant Archivist of the United States; Frank M. Root, Westinghouse Electric Corporation; Edward Wilber, Department of State

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Letter of Transmittal

WASHINGTON, D. C.
13 January 1949.

Dear Sirs: In accordance with Public Law 162, approved July 7, 1947, the Commission on Organization of the Executive Branch of the Government has undertaken an examination into the operation and organization of the executive functions and activities. In this examination it has had the assistance of various task forces which have made studies of particular segments of the Government. Herewith, it submits to the Congress a study prepared for the Commission's consideration of the Role of Records Management in the Federal Government.

The study of each task force naturally is made from its own particular angle. The Commission, in working out a pattern for the Executive Branch as a whole, has not accepted all of the recommendations of the task forces. Furthermore, the Commission, in its own reports, has not discussed all the recommendations of an administrative nature although they may be of importance to the officials concerned.

The Commission's own report on records management is submitted to the Congress separately as part of the volume of its report titled "Executive Services."

The Commission wishes to express its appreciation to the National Records Management Council, its executive director, Emmett J. Leahy who wrote the report as a whole, and to Robert H. Bahmer, Herbert E. Angel, Edward B. Wilber, and Frank M. Root, for the preparation of this task force study.

Seckent To

Faithfully,

Chairman

The Honorable

The President of The Senate

The Honorable

The Speaker of The House of Representatives

Table of Contents

	Page
I. Introduction.	1
II. General Recommendations	7
III. Detailed Recommendations	8
IV. Supporting Statements for All Recommendations	13
V. Summary of Anticipated Economics and Improvements	39
Appendices	41
Charts	
I. Total Cubic Fect of Federal Records (1930–1948)	3
II. Yearly Savings of Contents of One File Cabinet	16
III. Results of Records Screening in Five Naval Records Management Centers	18
IV. Cubic Feet of Records in Selected Records Centers	22
V. Management and Disposal of Army and Air Force Records	37

RECORDS MANAGEMENT

I. INTRODUCTION

Objectives

Record making and record keeping in the Federal Government represent:

- 1. Indispensable tools in the conduct of the Government's operations.
- 2. The greatest consumers of salaries, space, and equipment of all the house-keeping activities of the Federal Government.
- 3. The sum of the recorded obligations of the Federal Government, at home and abroad.
- 4. An invaluable store of hard earned experience recorded in our national effort to sustain a system of democracy and private enterprise.

The objectives of this report with recommendations are balanced accordingly:

- 1. To sharpen the efficiency of these management tools.
- 2. To eliminate excessive costs in salaries, space, and equipment.
- 3. To safeguard the essential record of our obligations.
- 4. To capitalize on our invaluable store of recorded experience.

Operation of This Task Force

This is the first time that the Federal Government has undertaken a balanced appraisal of its massive record-making and record-keeping operations. The Commission on Organization of the Executive Branch of the Government and the National Records Management Council have taken care to insure that its advisors on this project, whether from Government or industry, fully represented tested experience in each of the four components of such a balanced appraisal.

The consultants to the Commission and to the Council reached full agreement on the general and detailed recommendations included in Parts II and III of this report. The report as a whole was written by Emmett J. Leahy.

The consultants to the Commission and the Council, Robert H. Bahmer, Herbert E. Angel, Edward B. Wilber, and Frank M. Root, were unstinting with their time and experienced counsel. They join with Emmett J. Leahy in acknowledging the full support and splendid cooperation extended to this task force by Messrs. Sidney A. Mitchell, Pearson Winslow, Herber J. Miller, Robert L. L. McCormick, and Henry Luce III of the Commission's staff.

Staff assistants to Mr. Leahy, John F. X. Britt, Joan Hawkinson, and Helen Miller, were most helpful.

The cooperation and assistance of many Government officials made this report possible. Outstanding in this respect were Wayne C. Grover, Archivist of the United States; Herbert E. Angel, Director of Office Methods, Department of the Navy, and his staff members, Everett O. Alldredge, Paul Bishop, Diana Erseg, and Betty Barnett; William O. Hall, Director of Budget and Planning, Department of State; Leonard W. O'Hearn, Director of Administrative Planning, Federal Security Agency; Thurman T. Beach, Chief, Records Management Branch, Atomic Energy Commission; and W. E. Reynolds, Commissioner, H. G. Hunter, Assistant Commissioner, and John L. Nagle, Deputy Commissioner, Public Buildings Administration.

Gwilyn A. Price, President, Westinghouse Electric Corp., and Henry W. Lynch, General Assistant Comptroller, E. I. duPont de Nemours & Co., Inc., gave the task force full cooperation.

Scope of the Problem

This study gives ample proof of the fact that record making and record keeping are the greatest consumers of salaries, space, and equipment of all the housekeeping or service activities of the Federal Government.

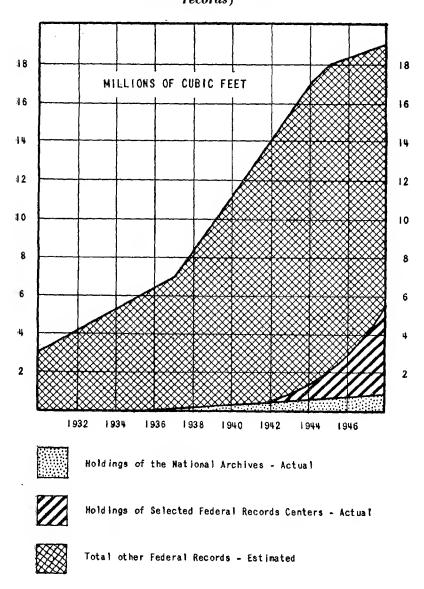
Salaries.—In 1940, an estimate was made of 340,000 employees, with annual salaries of \$680,000,000, engaged in handling records then accumulated or being created at that time. A much greater figure would apply were employees engaged primarily in record making added to these in record keeping. No actual count being available, an estimate of over 1 billion dollars is justifiable. Salaries of no other housekeeping or service function including Government accounting or personnel management remotely approaches this figure.

Space.—Approximately 18,500,000 cubic feet of Federal records (see accompanying Chart I, p. 3) occupy more than 18,000,000 square-feet of Federal space. This is equivalent to six Pentagons. Space costs are not less than \$27,000,000 annually. Actual surveys and official estimates carry this volume of records up to 17,000,000 cubic feet;

CHART I

Total Cubic Feet of Federal Records (1930–1948)

(The average standard file drawer contains 1½ cubic feet of records)



18,500,000 cubic feet is a weighted current estimate for the purposes of this study.

Operation and maintenance.—Space occupied by records is operated and maintained consistently at a cost close to the actual rental paid. Annual expenditures for this purpose are not less than \$20,000,000.

Equipment.—Records in such a quantity are equivalent to 3,080,000 standard four-drawer filing cabinets costing \$154,000,000 at current prices.

Approximately \$1,200,000,000 for record making and record keeping apportioned over the departments and agencies in Washington and in the field have compelled a few departments and agencies to aggressively attack these excessive costs. In the last decade, programs and facilities have been developed with excellent results. Similar programs and facilities have been developed in industry. These significant and highly profitable efforts represent management's first effective attempt to reduce excessive costs in record making and record keeping horizontally or clear across an agency. Previously, management's efforts were only vertical or following restricted patterns. These included the more or less common procedures control, methods studies, organization analysis, job analysis, and work improvement programs. The largest single cost factor represented by record making and record keeping per se, however, was not provided for as such in these attempts.

Determining Factors In Modern Records Management

Apace with industrial progress, there has been a revolutionary mechanization, specialization, and duplication in record making and record keeping. As a result, modern records accumulate in admittedly fantastic quantities and are maintained only at excessive costs.

Mechanization of the office began with the introduction of the type-writer around 1875. Adding, bookkeeping, calculating, tabulating, and recording machines rapidly followed. Mechanization of offices is expensive but it saves more expensive labor or gives a better result. There is an extensive backlog of improvements and new developments in the laboratories of the office machine industry. Further mechanization is assured. Widespread use of this equipment by spectacularly expanding public agencies and private enterprise in the United States is producing records in quantities wholly unapproached in the past and unparalleled abroad.

Specialization in record making and record keeping has resulted from the mighty American drive to get things done faster, cheaper or better. Several records wholly comprising a single operation such as bookkeeping in the last century has been divided and subdivided into

anywhere from a score to hundreds of component records. Countless specialized, single purpose records are the result.

Duplication in record making and record keeping also gets things done faster, cheaper or better. Labor and expense limited the clerk in the past to one or a few handwritten or press copies of a record. Carbon paper was introduced just prior to 1900. The mimeograph, photo lithography and chemical processes followed and acknowledge little or no limitation on copy making.

Record making and record keeping up to the beginning of this century were controlled by simple physical factors. Writing and copying by hand or letterpress was slow, laborious and costly; record making therefore was limited. Records to be filed were also limited. The mechanization, specialization, and duplication in modern record making have no comparable controls. Proof follows of the urgent need for new controls applicable by modern management.

This problem is further aggravated by (a) the increasing size and (b) the increasing complexity of an enterprise whether it be a Federal or county government, a small or large manufacturing company. The following data compiled under the auspices of Harvard's Graduate School of Business Administration illustrates this point:

VARIATIONS IN THE APPROXIMATE PERCENTAGE OF NECESSARY RECORD-KEEPING EMPLOYEES TO TOTAL EMPLOYMENT

[Classified by s	size of com	pany and comp	lexity of proc	lu c tion process]
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Size	Simple processes	Moderately complicated processes	Complicated processes
50 employees or less	Percent 3	Percent 4½	Percent 6½
51–100 employees	4	51/2	7½
101–200 employees	4½	61/2	8½
201–300 employees	5½	7½	10
101–200 employees	, -	,	

A much higher percentage of record keeping employees in larger and more complex enterprises is in a sense one of the curses of bigness. The Federal Government is, of course, one of the very largest and most complex operations.

The conclusions and resulting recommendations in this report comprise a program which is restricted solely to elements which have been tested, approved, and applied by agencies of the Federal Government, some State governments, many of the larger corporations, and some foreign governments. Bringing these elements together by means of detailed recommendations, providing them with the required support

and accountability, and widening their applications are the principal contributions of this study.

The recommendation that a Federal Records Administration be established provides the only practical and operationally sound organization to (1) consolidate and reduce the records centers now in existence at the same time broadening their services to assist all departments and agencies; (2) coordinate the management of the great quantities of records in Federal records centers with the objectives and requirements of the National Archives; (3) develop and sponser a Government-wide program for improvements and economies in records management as the agency best equipped and most concerned in the development of such a program.

II. GENERAL RECOMMENDATIONS

A. That a Federal Records Administration be established, and that the existing National Archives establishment become an integral part thereof.

B. That a law to be cited as the "Federal Records Management Act of 1949" be enacted to provide for the creation, preservation, management, and disposal of records of the United States Government.

C. That a minimum program for records management be required in each department and agency of the United States Government.

III. DETAILED RECOMMENDATIONS

Central Agency

- A. That a Federal Records Administration be established and that the existing National Archives Establishment become an integral part thereof.
- 1. That the Federal Records Administration establish and operate Federal records centers in Washington and in the field for the storage, servicing, security, and screening of all Federal records which must be preserved for a time but need not be retained in office equipment and space. It is recommended that this be accomplished by:
- a. Transferring records centers selected from among the more than 100 now operated by individual departments and agencies to the Federal Records Administration by negotiations with the departments and agencies concerned.
- b. Operating records centers so transferred and centers otherwise provided to service all departments and agencies.
- c. Effecting a consolidation and a reduction of existing and rapidly increasing duplication in records center facilities.
- d. Adapting as records centers, selected surplus war plants or some of the 100 war plants which have been placed in the industrial reserve and are now under the jurisdiction of the Public Buildings Administration.
- e. The construction or procurement of such other records centers as may be authorized from time to time by the Congress.
- f. Selecting all centers by location and size to insure (1) continued decentralization of Federal records in the interest of efficient servicing and use of records; and (2) dispersal of vital records in the interest of national security.
- 2. That the Federal Records Administration evolve and promote Government-wide improvements and economies in records management through:
- a. Standards and controls for record making and record keeping, selective records preservation, scheduled records disposal, and transfer of records to records centers.
- b. Discriminating application of tested methods, practices, materials, equipment, and machines to record making and record keeping.
- c. Authorization by law to inspect Federal records and to require reports as to their management.
- d. Training programs directed at improving the effectiveness and the technical knowledge of personnel assigned to record making and record keeping.

- e. Standards and controls for physical, legal, and security safeguards of all Federal records.
- 3. That the Federal Records Administration make special provisions for preserving, studying, and servicing Federal records having permanent value and historical interest by:
- a. Continuing the National Archives as an integral and vital part of the Administration.
- b. Continuing to maintain for this purpose an adequate professional staff of trained archivists.
- c. Placing such records and the professional staff under the general direction of an outstanding archivist selected in accordance with Civil Service Regulations on the basis of his professional attainments in a highly specialized field.

Legislative Action

- B. That a law to be cited as the "Federal Records Management Act of 1949" be enacted to provide for the creation, preservation, management, and disposal of records of the United States Government.
- 1. That when used in this act the word "records" includes any paper, book, photograph, motion-picture film, microfilm, sound recording, map, drawing, or other document, or any copy thereof that has been made by any agency of the United States Government or received by it in connection with the transaction of public business and has been retained by that agency or its successor as evidence of its activities or because of the information contained therein.
- 2. That the head of each agency shall make, cause to be made, or file only such records as in his opinion are necessary to provide for the continued effective operation of the agency of which he is the head, to constitute an adequate and proper recording of its activities, and to protect the legal rights of the Government of the United States and of the people.
- 3. That proposed legislation provide not only that (a) Federal records are the property of the United States Government; (b) such records be delivered by outgoing officials and employees to their successors (U. S. C. Title 18, secs. 234 and 235); and (c) such records must not be otherwise unlawfully destroyed or removed; but also fix responsibility on a Federal Records Administration for (d) establishing safeguards against removal or loss of Federal records and (e) initiating the recovery of Federal records which have been unlawfully removed.
- 4. That the act provide for the establishment of a Federal Records Administration in accordance with Recommendation A of this report

under the direction of a Federal Records Administrator appointed by the President with the advice and consent of the Senate.

- 5. That there also be established a Federal Records Administration Council superseding the existing National Archives Council (48 Stat. 1122 and 60 Stat. 812) and comprising the same membership as The National Archives Council with the addition of the Administrator of Federal Records. The Council should be responsible for:
- a. Formulating regulations governing record making, record keeping, and records disposal.
- b. The classes of records to be transferred to the Federal Records Administration.
- c. The use of records so transferred by public officials, scholars, and the people.
 - d. The loan or transfer of records from one agency to another.
- e. Standards governing the reproduction of records by photographic (or microphotographic) processes for the purpose of disposing of the original records.

Such regulations when approved by the President and promulgated by the Federal Records Administration shall be binding on all agencies of the United States Government.

- 6. That the head of each agency of the executive, legislative, and judicial branches of the Federal Government designate or appoint within 6 months after the passage of the proposed act, a records management officer for the agency, and that the Federal Records Administration be notified of such designations. Records management officers should plan, develop, and put into operation a comprehensive records management program in the agency and serve in a liaison capacity with the Federal Records Administration.
- 7. That no records of the Federal Government shall be destroyed or otherwise disposed of without the approval of (a) the Federal Records Administration and (b) the Congress of the United States, as provided by law and regulations of the Federal Records Administration Council.
- 8. That the Congress consider revising present legislation governing the disposal of Federal records (44 U. S. C. 366–330) to provide for an automatic records disposal authorization 45 days after a request for authorization has been submitted by an agency to the Federal Records Administration, provided that the Congress is in session during the last 15 days of the period and provided further that neither the Federal Records Administrator nor the Congress direct that the proposed disposal or a part thereof is disallowed or that it be delayed pending further study.
- 9. That recent legislation (H. R. 6293, Report No. 1938, 80 Cong., 2d. sess.) establishing a trust fund for receipts from photographic

services rendered by the National Archives be continued for similar services rendered by the Federal Records Administration.

- 10. That the National Archives Trust Fund Board (U. S. C. 300aa-300jj), the National Historical Publications Commission (48 Stat. 1122-1124), and the Franklin D. Roosevelt Library (53 Stat. 1062) be continued as a part of the National Archives within the Federal Records Administration, and that the Federal Register (44 U. S. C. 301-314) be continued as a separate unit of the Federal Records Administration.
- 11. That the draft of a Federal Records Management Act included in Appendix A be considered as a basis for the recommended legislation. Past legislation which is effected in part by the proposed act is listed in Appendix B.

Agency Program

- C. That each department and agency of the Federal Government be required by law, or by resolution of the Federal Records Administration Council approved by the President, to appoint or designate a qualified records management officer to plan, develop, and organize a records management program. The minimum content of a records management program should include tested controls on record making, record keeping and selective records preservation.
- 1. Controls on record making with a high degree of effectiveness are:
- a. Elimination of widespread and unessential duplication of files and filing through files and filing analysis.
- b. Discriminating application of modern office machines and equipment to record making.
- c. Streamlining and reducing voluminous correspondence through the use of form letters, pattern letters, limitation or elimination of copies, pattern paragraphs, procedural guides, automatic typewriters, and other labor-saving equipment.

Controls on forms and reports are essential and should include:

- d. Controls on the development, issue, standardization, and use of forms with a view to simplifying and improving forms in size, design, and function, reducing the number of forms and determining their use, method of filing and ultimate disposal.
- e. Controls on requirements for and submission of reports, eliminating obsolete reports, unessential copies, too frequent reporting, and unessential filing of reports, coordinating all reporting to eliminate overlapping and duplication in fact gathering.

- 2. Controls on record filing should include:
- a. Organization of files in efficient and practical locations considering factors of physical proximity and administrative necessity, successful eliminating wide-spread maintenance of duplicate files.
- b. Discriminating installation of labor-saving devices such as modern microfilming, tabulating equipment, etc., to simplify filing, the accumulation of recorded data and to reduce filing space.
- c. Efficient and effective work flow patterns for mail rooms and file-room installations, including effective layouts and lighting.
- d. Standards and criteria for systems and methods of handling, classifying, indexing, and filing, and for filing supplies and equipment.
- e. Review of requisitions for filing equipment to control purchases, allow for interchange of equipment, and to provide guidance as to the best equipment available.
- f. A training program in all phases of records management regularly being brought up to date by the addition of new developments in records-management practices, equipment, and supplies.
 - 3. Controls insuring selective records preservation require:
 - a. Periodic inventory of all records.
- b. Development and installation of comprehensive schedules providing for (1) prompt disposal of valueless records, (2) periodic transfer to records centers of records which need not be kept in expensive equipment and office space, (3) periodic transfer of records of permanent historical value to the Federal Records Administration for deposit in the National Archives, (4) controls to effect record turn-over in conformance with schedules.
- c. Applications of microfilming to conserve space and equipment and to provide security microfilm copies of vital documents, the loss of which would seriously handicap the Government.

IV. SUPPORTING STATEMENTS FOR ALL RECOMMENDATIONS

For Centralization

A. That a Federal Records Administration be established and that the existing National Archives Establishment become an integral part thereof.

Less than 5 percent of Federal records are deposited in the National Archives. This institution accessions all Federal records of permanent value and historical interest. Holdings, nevertheless, are close to the total capacity of the existing building.

The bulk of Federal records, more than 95 percent or approximately 17,500,000 cubic feet, represents a large-scale management problem. The extent of the problem is measurable by the great costs tied up in space, equipment, and personnel as reported in Part I of this report.

The experience, particularly during the last decade, of a few departments and agencies of the Government and of large companies in industry prove conclusively that prevailing large-scale problems in records management lend themselves with surprising ease to equally large-scale solutions.

This study confirms for the first time that more than 50 percent of the total records of the average organization can be eliminated from office and plant equipment and space. Such a spectacular return was not fully anticipated. The critically accurate appraisals and measurements conducted during this study, carefully checked against the results obtained by representative companies in industry, now make it possible for the first time to guarantee such results given a basic minimum of low-cost conditions.

These appraisals and measurements were applied to accomplishments and not potentials in successful records management programs in government and industry. The results appear under the appropriate sections of this report.

Elimination of over 50 percent of all records from office and plant equipment and space is easily attainable in a relatively short period of time by:

1. Destruction of up to 35 percent of valueless or duplicated records with a continuing annual turn-over by destruction of 10 percent or more of the remaining records.

- 2. Initial transfers to storage in records centers of more than 20 percent of records that must continue to be preserved at least for a time, with continuing transfers each year thereafter of an additional 10 percent or more of the remaining records.
- 3. An annual turn-over of between 10 percent and 25 percent of the holdings in records centers by destruction of records which have served out their time.

Still more important but less adaptable to measurement and fore-casting are the economies and improvements which have been made and can be made on a much greater scale in current records management. Splendid if sporadic progress is reported in the following sections of this report in such areas as birth control on record making, elimination of unessential filing and duplication of files, more efficient and more economical organization of records, and progressive applications of office machines, equipment, and systems to record making and record keeping. Wide extension of these scattered instances of improvements and savings in current records management is a primary objective.

Uniformly in Government and in industry there are three essentials in records management programs which have yielded these large-scale savings and improvements:

- 1. Fixing responsibility for records management on a qualified individual, staff, or organization.
- 2. Developing and applying a program of controls in record making, record keeping, selective records preservation, and records disposal.
- 3. Providing records centers for the storage, servicing, security, and screening of records which must be preserved for a time but need not be retained in expensive office or plant equipment and space.

This report presents a program to provide these three essentials at the level of the Federal Government as a whole and at the level of each department and agency.

The establishment of a Federal Records Administration is recommended to take place of the National Archives as an independent agency. If at this time or in the future, a department of general administration is established, the inclusion of the Federal Records Administration therein should be considered. It is recommended further that the essential function of the National Archives be continued as an integral part of the new agency.

A Federal Records Administration is essential primarily to operate Federal records centers in addition to the National Archives. Federal records centers are required for the storage, servicing, security, and screening of approximately one-third, or 6,000,000 cubic feet, of records. More than 4,000,000 of these records are now stored in more than 100 duplicating and overlapping records centers established in the last 10 years by less than a score of the departments and agencies. A minimum of an additional 2,000,000 cubic feet of records continue to be

unnecessarily housed in expensive office equipment and space in the hundreds of agencies which have not established records centers and do not have access to those established by other agencies.

Some central agency is necessary to operate fewer records centers to serve all departments and agencies, instead of the more than 100 existing records centers serving only a score of the departments and agencies. The justification for records centers and their operation by the Federal Records Administration is given in Section 1 which follows. The reasons why it is not recommended that the operation of these centers be simply added as a new duty to the National Archives are given in Section 3 of this part of the report.

Some central agency is necessary to tie in the line function of operating the Federal records centers with the line function of administering the National Archives. Both functions are but two phases of the single problem of managing Federal records and steadily screening them down to the relatively small core of records having permanent value and historical interest.

A central agency is also needed to evolve and promote Government-wide improvements and economies in records management through the development of standards, technical guidance and assistance, and training programs, to establish physical, legal, and security safeguards of records; and to insure a follow through by all agencies in improvements, economies, safeguards and the use of available facilities. The Federal Records Administration must for its own purposes develop a high degree of responsibility for and technical knowledge in records management on the part of its own staff members. Through this recommendation, it is assured that this responsibility and technical knowledge has an effective channel into the individual departments and agencies. Further justification on this point is given under Section 2 of this part of the report.

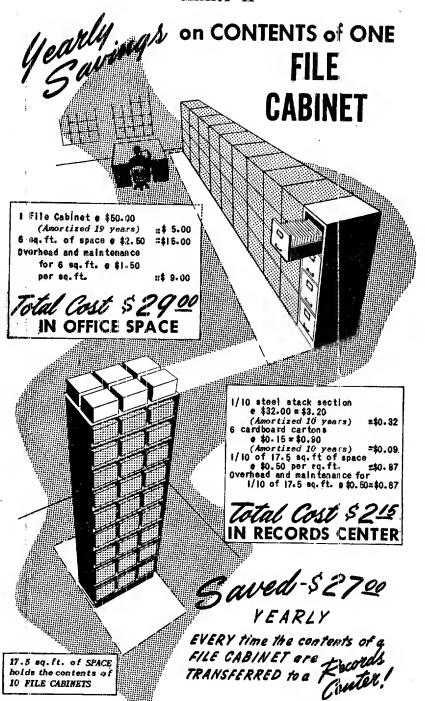
FOR RECORD CENTERS

1. That the Federal Records Administration establish and operate Federal records centers in Washington and in the field for the storage, servicing, security, and screening of all Federal records which must be preserved for a time but need not be retained in office equipment and space.

Savings of more than 90 percent in the cost of records equipment, space, and maintenance are easily obtained by a transfer of records out of office equipment and space into a well-planned records center. The accompanying chart II, page 16, illustrates these savings.

The Army and Navy alone in the last 6 years have transferred more than 2½ million cubic feet of records. This represents the contents of more than 400,000 four-drawer filing cabinets with a replacement value of over \$20,000,000. The Westinghouse Electric Corp. has trans-

CHART II



ferred over 140,000 cubic feet of records. This represents the contents of more than 20,000 four-drawer filing cabinets with a replacement value of \$1,400,000.

Despite the savings to be realized and the need for release of space in crowded offices and installations, the majority of departments and agencies do not now have access to records centers. It has been carefully estimated by this task force of the Commission that in such departments and agencies there are now 2 million cubic feet of records available for transfer to records centers were centers available. These records occupy 2 million square feet of space, which is close to the capacity of the Pentagon, and represent the equivalent of more than 330,000 four-drawer filing cabinets with a replacement value of approximately \$17,000,000.

Transfer of records at the earliest practical date to responsible custody in a records center not only drastically slashes equipment, space, and maintenance costs, but it insures an audit or a check on unessential records preservation. In addition to sharply reduced costs, the resulting minimum cost, which is not a new cost, is in turn isolated, measurable, and controllable. Valueless records can be screened out. Records which have served their time turn over promptly. Chart III, page 18, illustrates the importance of records screening.

Stress must be laid on the fact that records centers to be profitable cannot be dumping grounds for dead records forgotten and inaccessible. It is true that only minimum building and equipment requirements are justified. But the management of such facilities must clamp controls on records retention, provide continuous screening of valueless records, and give prompt, efficient service.

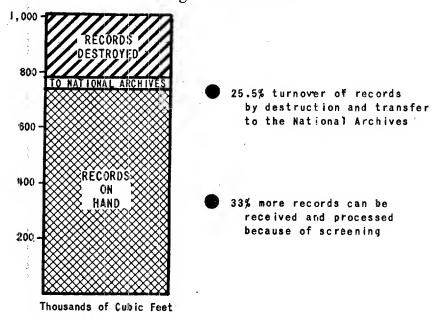
It is significant that Navy records centers directed by experienced civilian records administrators have achieved a 25.5-percent records turn-over. One Army records center also directed by an experienced records administrator has achieved a 37-percent records turn-over.

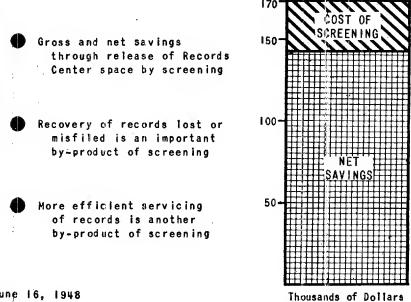
- a. Transferring records centers selected from among the more than 100 now operated by individual departments and agencies to the Federal Records Administration by negotiations with the departments and agencies concerned.
- b. Operating records centers so transferred and centers otherwise provided to service all departments and agencies.

For the purpose of this study, 99 records centers, all of which have been created in the last 6 years to meet an obvious need were selected for study. It is apparent that a comparatively small number of agencies operate such centers and for their own purposes only. The large

CHART III

Results of Records Screening in Five Naval Records Management Centers





June 16, 1948

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number of these facilities multiply overhead and maintenance costs. Selected centers from among those now in operation should be transferred to the Federal Records Administration and their facilities made available to all departments and agencies. Twice before the question has been raised, "Will an agency readily transfer records to a center operated by some other agency?" This question was first raised in the mid-thirties after the establishment of the National Archives. In a few short years, by 1940, record transfers to the National Archives were filling available space with totally unanticipated rapidity. In the early 1940's a few departments established records centers to serve all bureaus and divisions of the departments. Again it was thought that nearly autonomous bureaus would not relinquish their records. Since 1943, over 1½ million cubic feet of records have been transferred to Army centers and over 1 million feet have been transferred to Navy centers.

Two factors press for transfer of records. Expanding governmental operations because of the New Deal, the last war, or for whatever reason, create such a scarcity of space that any relief, and particularly record transfers, are resorted to extensively. Conversely, reduced appropriations during periods of retrenchment yield similar results for different reasons. Although in periods of retrenchment, office space is much less critical, management withholds funds for the maintenance of large quantities of records which need not be retained in expensive equipment in offices with a high overhead, thus forcing record transfers.

c. Effecting a consolidation and a reduction of existing and rapidly increasing duplication in records center facilities.

Overhead costs are multiplied in the maintenance of a large number of relatively small centers. For security, as well as for more efficient service, over centralization in the storage of records is not advisable. But the expense of maintaining three or four medium-size centers in a single locality, such as is now the case with the Maritime Commission, the Army, and the Navy in the vicinity of New York City, is waste. Until recently General Accounting Office records were maintained in 16 different buildings in Washington with an annual maintenance and operation expense of \$132,400 in addition to a \$76,500 rental for non-Government-owned buildings, or a total of \$208,000. Consolidating these records in Government-owned space in Cameron, Va., cut annual costs to \$90,000 for a yearly savings of \$118,000. Furthermore, the records scattered through many buildings occupied 305,000 square feet whereas when consolidated they occupied only 267,000 square feet of space.

Further argument for consolidating and at the same time reducing the number of existing centers is the present necessity of large-scale

record shipments. For example, even though there is a large Navy records center at San Bruno, Calif., Veterans' Administration records on the West Coast must be shipped to Philadelphia, Maritime Commission records to Hoboken, and Army records to St. Louis. To move G. A. O. records the short distance to Cameron, Va., while justified, cost nearly a quarter of a million dollars. Thousands of tons of records crisscrossing the country is expensive and unnecessary.

- d. Adapting as records centers, selected surplus war plants or some of the 100 war plants which have been placed in the industrial reserve and are now under the jurisdiction of the Public Buildings Administration.
- e. The construction or procurement of such other records centers as may be authorized from time to time by the Congress.
- f. Selecting all centers by location and size to insure (1) continued decentralization of Federal records in the interest of efficient servicing and use of records and (2) dispersal of vital records in the interest of national security.

Selected surplus war plants or some of the 100 war plants which have been placed in the industrial reserve are in many cases idle and readily adaptable to records centers. The War Assets Administration has used more than one-half dozen of these plants for temporary storage and screening of the Administration's large quantity of field records. Whatever the likelihood of any future urgency for the immediate availability of such plants, the bulk of the War Assets Administration's records retirement program seems to be well over the hump through the temporary use of these facilities.

It is expected that there will be good reason for the construction or procurement of one or more buildings for records center purposes. For the most part, it is expected that new construction for records centers as well as most other public purposes will be included in longer range Public Works programs. An exception might well be a records center in the vicinity of Washington but not in the city proper to ease the space shortage in the Capital.

Greater decentralization of Federal records is effected by the Federal Records Administration's operation of general purpose centers serving all departments and agencies. A Federal Records Administration center on the west coast for example would retain Veterans' Administration records on the west coast. The same will be true of Federal Records Administration centers elsewhere around the country. For the most part, agency records are now being centralized in one or a few centers far removed from the offices which must use the records. Such decentralization is an important component of dispersal of Federal records in the interest of national security.

FOR CENTRAL SUPERVISION

2. That the Federal Records Administration evolve and promote Government-wide improvements and economies in records management.

A single central source to sponsor improvements and economies in records management is one of the three essentials of all existing, successful programs. Fixing this responsibility in the Federal Records Administration gives direction, support, and a medium of accountability. This direction, support, and accountability are not now provided.

The Budget Bureau and the National Archives have made some attempts in program sponsorship. Beginning in 1942 with a supplemental appropriation specifically for the development of a Government-wide program in records management, an effort was made by the National Archives. This effort in time became sharply limited to the few phases of records management that most directly effect the isolation and eventual transfer of the small percentage of records which have permanent value and historical interest.

Shortly after the National Archives' effort, the Budget Bureau assigned a staff member full time to records management. The principal result not to be minimized was a policy decision in the Bureau that every agency should have fixed responsibility for an agency-wide records program. Executive Order 9784 of September 25, 1946, added Presidential approval of this bureau policy.

The Federal Records Administration through primary interest and technical experience is a more fitting central agency to undertake this staff function of developing a program, providing experienced counsel and expert assistance, and sponsoring training programs. These staff services are a vital supplement and a support to the facilities and line service provided in the Federal-records centers.

At negligible cost a small staff, initially not more than a half a dozen, can promote, assist, and fill in the programs at the department and agency level. In the unanimous opinion of this task force of the Commission, the return from this small staff function will annually exceed the large scale savings to be gained through the establishment of records centers. The character and extent of these improvements and economies are illustrated in Part IV, Section C, of this report.

This staff function in the Federal Records Administration must be carried through in close collaboration with other staff and service functions of the Government, including particularly the Bureau of the Budget. Major programs and Government-wide regulations must be cleared through the Federal Records Administration Council and receive Presidential approval. This guarantees clearance and coordination with the Executive Office of the President, and with the major departments through their representatives on the Council.

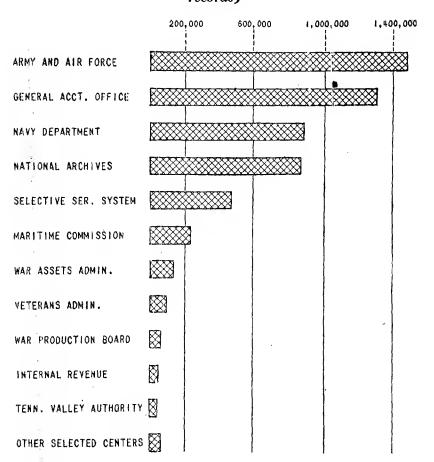
The content of this staff function should include:

a. Standards and controls for record making and record keeping, selective records preservation, scheduled records disposal, and transfer of records to records centers.

CHART IV

Cubic Feet of Records in Selected Records Centers

(The average standard file drawer contains 1½ cubic feet of records)



- b. Discriminating application of tested methods, practices, materials, equipment, and machines to record making and record keeping.
- c. Authorization by law to inspect Federal records and to require reports as to their management.
- d. Training programs directed at improving the effectiveness and the technical knowledge of personnel assigned to record making and record keeping.
- e. Standards and controls for physical, legal, and security safeguards of all Federal records.

FOR PRESERVING PERMANENT RECORDS

- 3. That the Federal Records Administration make special provisions for preserving, studying, and servicing Federal records having permanent value and historical interest by:
- a. Continuing the National Archives as an integral and vital part of the administration.
- b. Continuing to maintain for this purpose an adequate professional staff of trained archivists.
- c. Placing such records and the professional staff under the general direction of an outstanding archivist selected in accordance with the Civil Service Regulations on the basis of his professional attainments in a highly specialized field.

The National Archives performs an essential and an important function in receiving, organizing, preserving, and making available to the Government, to scholars, and to the people the core of permanently valuable records of the Government. This is an indispensable service of all mature governments. It should, therefore, continue to be sustained by the Government of the United States.

Serious consideration was given to adding the functions recommended in 1 and 2 above, namely the operation of Federal records centers and the development and promotion of Government-wide improvements and economies in records management to the existing National Archives. The three reasons favoring such a recommendation are:

- a. The National Archives is a going concern.
- b. It is the only agency primarily in the records field although in a specialized and limited segment of that field.
 - c. It has won recognition and standing in the 14 years of its existence.

To do so, however, would change the character and scope of the National Archives so radically as to create, in fact, a new kind of agency. The potential change in size is shown in Chart IV, page 22. Not to change the name and concept as well would dodge the issue and contribute to a confusion of objectives and programs.

The following comparison between the National Archives and selected departmental centers, as of June 18, 1948, is significant:

	Number of centers	Number of employees	Volume of records, cub c	Square feet of space
Departmental record centers National Archives Percentage National Archives to other centers	99 _2	6, 259 350	4, 787, 491 860, 000	6, 171, 958 845, 647
	2. 0%	5. 6%	17. 9%	13. 7%

For compelling reasons it is recommended that a Federal Records Administration replace the National Archives as an independent agency and that the latter be continued as an integral part of the new agency. These reasons are:

- a. The essential specialized function of The National Archives is limited to only 5 percent of Federal records.
- b. The archival function requires a comparatively small professional staff and optimum storage facilities.
- c. The 95 percent of Federal records outside The National Archives present primarily a management rather than an archival problem.
- d. Operation of Federal records centers require competent management assisted for the most part by clerical and administrative employees rather than professional, archival assistance.
- e. Records centers to be effective require mass handling of a great volume of records with minimum conditions for storage, space, equipment, containers, and types of service. Techniques are administrative rather than archival.
- f. The development and promotion of a program for Government-wide improvements and economies in records management require modern management techniques rather than archival science.

Since the preponderance of the proposed program is a management function, and since the National Archives is now performing an essential, specialized function, blowing up the latter to include the former would gain nothing and very probably detract from the effectiveness of the two separate functions. Transferring the ablest of the personnel operating existing departmental records centers with or without their center facilities, would be a better source of talent for Federal records center operation and for the most part at no new cost to the Government.

Transfer of experienced personnel from the most effective records management staffs in the departments and in industry would also be a better source for the small staff responsible for developing and promoting a program for Government-wide improvement and economies in records management.

It is fair to conclude that the National Archives has been under pressure from departments and agencies seeking assistance in attempts to bring massive and burdensome accumulations of records under con-

trol. Such pressure has of necessity frequently diverted the National Archives from its prime purpose although such diversion was in the public interest.

This report makes more effective provisions for the assistance required by the departments and agencies. At the same time and as a result of such provisions, the staff of the National Archives can concentrate on the objectives for which it was created. Foremost among these objectives is to preserve, explore, and make available the invaluable store of hard-earned experience recorded in the permanent records of our national effort to sustain a system of democracy and private enterprise.

The foregoing recommendations in this Part (IV A-1-3) of the report are essentially similar to that made in 1947 by the Advisory Committee on New York State Records System and in 1948 by a Planning Staff on the Los Angeles City Government Records System.* Other States are contemplating similar programs.

For Legislation

B. That a law to be cited as the "Federal Records Management Act of 1949" be enacted to provide for the creation, preservation, management, and disposal of records of the United States Government.

Existing legislation covering Federal records consists primarily of the act establishing a National Archives, an act covering the disposal of records and sections of the Criminal Code prescribing penalties for unauthorized removal, destruction, or falsifying of Federal records. More comprehensive and constructive legislation is required.

In addition to establishing the Federal Records Administration in accordance with Recommendation A, legislative action is required to change the status of the National Archives, the National Archives Council, and the Federal Register; to clarify the definition of Federal records; to prevent the removal of official records by outgoing officials and provide for the recovery of such records which are removed; and to simplify the disposal of valueless records.

Basic Steps

1. That when used in this act the word "records" include any paper, book, photograph, motion-picture film, microfilm, sound recording map, or other document (of any physical form or character whatever), or any copy thereof that has been made by any agency of the United States Government or received by it in connection with the transaction of public business and has been retained by that

^{*}It is noteworthy that the New York Advisory Committee consisted of the Archivist of the United States at that time, the Librarian of Congress, and the Archivist of Illinios. Each of the three members of this committee also have served either as President of Vice President of the Society of American Archivists.

Approved For Release 2001/08/10: CIA-RDP78-04718A002700210006-5 agency or its successor as evidence of its activities or because of the information contained therein.

- 2. That the head of each agency shall make or cause to be made only such records as in his opinion are necessary to provide for the continued effective operation of the agency of which he is the head, to constitute an adequate and proper recording of its activities and to protect the legal rights of the Government of the United States and of the people.
- 3. That proposed legislation provide not only that (a) Federal records are the property of the United States Government; (b) such records be delivered by outgoing officials and employees to their successors (U. S. C. Tille 18, secs. 234 and 235); and (c) such records must not be otherwise unlawfully destroyed or removed; but also fix responsibility on a Federal Records Administration for (d) establishing safeguards against removal or loss of Federal records and (e) initiating the recovering of Federal records which have been unlawfully removed.

It has been necessary since the establishment of the National Archives to define and redefine what is meant by Federal records. Any definition to be helpful to Federal officials should be both inclusive and exclusive. Consideration should be given for purposes of clarification to adding to the definition in B-1 above the following:

There are excluded from this definition library material acquired by an agency solely for the information and use of the staff and the public and not created or received by it incidentally to the transaction of public business; museum material acquired and preserved solely for exhibition; documents submitted for copyright; models submitted in connection with application of patents; extra copies of documents preserved solely for convenience of reference; and stocks, publications and processed documents. Upon the request of any agency, the Administrator of Federal Records shall have authority to determine whether any particular body of materials falls within or without this definition.

Legislation (U. S. C. Title 18, secs. 234 and 235) and departmental regulations, such as pre-World War II Navy Regulations, have justifiably been interpreted by Federal officials to require filing of all papers produced or received. The impact of the World War II expansion made the continuance of this costly practice impossible. Great quantities of valueless or duplicated papers are received by or produced by Federal agencies. It is important to legalize birth control not only on the production and receipt of such material but also on the unnecessary filing thereof. Early in the war, the Archivist of the United States provided some relief by a new definition of "nonrecord materials." Many agencies, with the Civil Service Commission taking the lead, conducted an intensive review of their filing practices and drastically but safely eliminated a great volume of unessential filing.

While there is legislation against the unlawful destruction, removal, or falsifying of Federal records, there is no provision for safeguards against such destruction, removal, or falsifying, nor any machinery for

initiating action when destruction, removal, or falsifying of records is threatened or for the recovery of records which have been unlawfully removed.

Records removed by officials leaving the public service present a specially critical problem. Many and varied measures to prevent such removal have been adopted by other governments. For the most part, the removal of records is confined to high-ranking officials. As a result, most of the records removed are important or valuable. While it is important that records be defined by law as the property of the Federal Government and there be penalties for unlawful destruction, removal, or falsification of such records, it is equally important that the Congress set up the machinery to forestall such loss, to effect recovery in the event of such loss, and provide that records so removed are recoverable at no cost to the Federal Government. The papers of some Presidents and Cabinet officials have had to be purchased back by the Federal Government.

FOR CENTRAL AGENCY

4. That the act provide for the establishment of a Federal Records Administration in accordance with Recommendation A of this report under the direction of a Federal Records Administrator appointed by the President with the advice and consent of the Senate.

The details covered by this recommendation and the justification therefor are given in Section III-A of this report.

FOR RECORDS COUNCIL

5. That there also be established a Federal Records Administration Council superseding the existing National Archives Council (48 Stat. 1122 and 60 Stat. 812) and comprising the same membership as the National Archives Council with the addition of the Administrator of Federal Records.

A Federal Records Administration Council is needed to replace the present National Archives Council. The membership can be the same as that of the National Archives Council with the addition of the Administrator of Federal Records.

Authority should be granted the Council to appoint advisors from other agencies of the Federal Government, and from industry and other organizations outside the Federal Government. A vitalized and more aggressive council representing the major departments and with authority to appoint advisors from other agencies of the Government and from private industry should serve as an effective advisory body and, in a sense, a regulatory body for the management of Federal records. In the last analysis, record making and record keeping is an essential function of each agency of the Government. These agencies, therefore, should have a voice in planning the regulations and policies governing record making and record keeping.

It is doubtful if the departments and agencies of the Executive branch would or should acquiesce to the assignment of responsibilities so closely affecting their record making and record keeping direct to the Federal Records Administrator rather than to a council in which they were represented. The council should be responsible for formulating regulations governing:

- a. Record making and record keeping, records protection and records disposal.
- b. The classes of records to be transferred to the Federal Records Administration.
 - c. The use of records so transferred by public officials, scholars, and the people.
 - d. The loan or transfer of records from one agency to another.
- e. The standards governing the reproduction of records by photographic (or microphotographic) processes when the purpose of such reproduction is to dispose of the original records.

It is recommended that regulations formulated by the Federal Records Administration Council require the approval of the President. With Presidential approval, such regulations when promulgated by the Federal Records Administration Council shall be binding on all agencies of the United States Government.

FOR AGENCY OFFICER

6. That the head of each agency of the executive, legislative, and judicial branches of the Federal Government designate or appoint within 6 months after the passage of the proposed act, a records management officer for the agency, and that the Federal Records Administration be notified of such designations. Records management officers should plan, develop, and put into operation a comprehensive records management program in the agency and serve in a liaison capacity with the Federal Records Administration.

The importance of fixing responsibility in each department and agency for a minimum program of records management and the content of such a program are described in Section III-C of this report. Affirming the principle by legislative act strengthens the attempt in this respect made by Executive Order 9784.

Other provisions of the proposed legislation assure an accountability for both conformance and performance by the departments and agencies in following through on this requirement.

FOR CONTROL OF DESTRUCTION

7. That no records of the Federal Government shall be destroyed or otherwise disposed of without the approval of (a) the Federal Records Administration and (b) the Congress of the United States, as provided by law and regulations of the Federal Records Administration Council.

Legislation governing the disposal of Federal records are more than adequate at the present time. They can be simplified to advantage. In addition to the National Archives Act, subsequent legislation under

pressure of the vast quantities of Federal records which should and must be disposed of have frozen into statute provisions and procedures which can much better be covered by regulations of the Federal Records Administration Council. Such regulations can be more easily modified to meet changing conditions. Essentially, it is necessary to prescribe by law only that no records of the Federal Government shall be destroyed or otherwise disposed of without the approval of (a) the Federal Records Administration and (b) the Congress of the United States.

With millions of feet of valueless Federal records turn-over by disposal annually, it is imperative that the turn-over be orderly and prompt. Millions of dollars in space and equipment are involved by unnecessary delays or reporting routines. Some question has been raised about the delays incidental to present legislation requiring the approval of all records disposal by both the National Archives and the Congress. The United States Government, like all other governments without exception both in the States and abroad, finds it necessary to place a brake and a control on the disposal of public records.

It is true that there is a costly delay in the turnover of valueless records when the Congress is not in session but Federal officials consulted in connection with this point, feel they need both the assurance and the protection inherent in congressional approval of all records destruction

or disposal they undertake.

If the Congress should confine legislation on this score to the provision that no records be destroyed except with the approval of the Federal Records Administration and the Congress, or in accordance with planned programs, approved by the Federal Records Administration and the Congress, there will be adequate safeguards on this score and maximum latitude to the Federal Records Administration in the programs, procedures, and routines effecting such disposal.

FOR AUTIIORIZATION OF DESTRUCTION

8. That the Congress consider revising present legislation governing the disposal of Federal records (44 U. S. C. 366–380) to provide for an automatic records disposal authorization 45 days after a request for authorization has been submitted by an agency to the Federal Records Administration, provided that the Congress is in session during the last 15 days of the period and provided further that neither the Federal Records Administrator nor the Congress direct that the proposed disposal or a part thereof is disallowed or that it be delayed pending further study.

In 1941, the average time required by a typical agency to obtain disposal authorization for its great quantities of valueless records was 13 months and 28 days. Intervening legislation has speeded up this procedure considerably; nevertheless, a check in the course of this study showed a lapse of 101 days between the date of the average request for disposal authorization and receipt of actual authorization.

The change now proposed will not only cut the lape of time to less than one-half. It will further require formal action by the Federal Records Administration and the Congress only on less than 2 percent of the items listed in requests for records disposal authorization. Consistently over the years, less than 2 percent of the items have been questioned by the National Archives or the Congress. Ninety-eight percent of the items requested for disposal authority will be approved automatically without any formal action.

FOR TRUST FUND

9. That recent legislation (H. R. 6293, Report No. 1938, 80th Cong., 2d sess.) establishing a trust fund for receipts from photographic services rendered by the National Archives be continued for similar services rendered by the Federal Records Administration.

This legislation of the Eightieth Congress authorizes a useful service on a self-sustaining basis at no cost to the Government and should be continued.

FOR CONTINUED CONSOLIDATION

10. That the National Archives Trust Fund Board (U. S. C. 300aa-300jj), the National Historical Publications Commission (48 Stat. 1122-1124), and the Franklin D. Roosevelt Library (53 Stat. 1062) be continued as a part of the National Archives within the Federal Records Administration, and that the Federal Register (44 U. S. C. 301-314) be continued as a separate unit of the Federal Records Administration.

The National Archives Trust Fund Board, the National Historical Publications Commission, and the Franklin D. Roosevelt Library perform useful functions as they are now constituted and should be continued as a part of the function of the National Archives.

The Federal Register has ably performed a valuable service in the regular publication of Federal regulations that have general applicability and legal effect, and also in publishing the Code of Federal Regulations. The Federal Register should be continued but as a separate part of the Federal Records Administration rather than as a part of the National Archives.

The Congress might well consider the assignment of the publication of the "Statutes at Large" and the "United States Code" to the Federal Register. The "Statutes at Large" are now compiled by the State Department and the "United States Code" is compiled by private companies under contract to the Government. But the Federal Register should be able to undertake these additional duties successfully as indicated by the fact that the "United States Code" is about one-fifth the size of the "Code of Federal Regulations" now compiled by the Federal Register.

FOR BASIS OF LEGISLATION

11. That the draft of a Federal Records Management Act included in Appendix A be considered as a basis for the recommended legislation. Past legislation which is affected in part by the proposed act is listed in Appendix B.

For Agency Program

C. That each department and agency of the Federal Government be required by law, or by resolution of the Federal Records Administration Council approved by the President, to appoint or designate a qualified records management officer to plan, develop, and organize a records management program. The minimum content of a records management program should include tested controls on record making, record keeping and selective records preservation.

There are extraordinarily effective records management programs in a few agencies of the Federal Government. These programs are directed by capable records management officers. Outstanding are the Department of the Navy, Department of Agriculture, the Atomic Energy Commission, the Federal Security Agency, and the Departments of the Army and Air Force. Other successful programs have been conducted in the Office of Price Administration and the War Assets Administration.

The urgent need for a records management officer in every agency is not now recognized for the first time. In 1942, the Society of American Archivists proposed to the Bureau of the Budget that each agency be required to appoint a records management officer. In the same year, the National Archives endorsed this proposal and issued a statement on the proposed functions of such officers in the Federal Government.

Executive Order 9784, issued September 25, 1946, required that an active continuing program for effective current records management and disposition of records be established in each agency. Only some agencies responded to this Executive order. Many others failed to comply with the order or undertook only a token compliance. The need for implementing this Executive order is uniformly acknowledged.

The experience of the few Federal agencies with highly effective programs and of companies in private industry with similar programs, such as the Westinghouse Electric Corp., the Denver & Rio Grande Western Railroad, and Standard Brands, underscore the in-

dispensability of a fixed central responsibility in an agency or company at a sufficiently high level to insure an aggressive, effective, and coordinated program. The staffing of records management offices is readily determinable and controllable on the basis of the size of the agency and the scope of its records problems. In smaller agencies, the assignment of the records management function on a part time basis to some existing staff member is adequate.

In some agencies, it has been assumed that the existence of more or less well-equipped planning offices, methods and procedure units, or management-control staffs will in time at least provide the required economies and improvements in records management within the agency. This assumption is not warranted by the experience in the Government to date, nor is it warranted by experience in industry. Exceptions are sufficiently limited to underscore the fact that this assumption is honored more in the breach than in the observance.

It is recognized that in some agencies responsibility for records management will be assigned to existing planning, methods and procedures, or management staffs. As recommended in this report a specific, practical program is assignable, and for the first time there is a vehicle providing an accounting for and a measuring of performance in the execution of the program.

Sheer cost factors of personnel, space, and equipment assigned to record making and record keeping require (a) a well-defined program and (b) a fixed responsibility for planning, developing, organizing, and following through on a reduction of these costs, and the creation of a more effective agency-wide records system.

Controls Suggested

- 1. Controls on record making with a high degree of effectiveness are:
- a. Elimination of widespread and unessential duplication of files and filing through files and filing analysis.

As pointed out in the supporting statement to recommendation B-3, there is a widespread belief that every record made or received must be filed. This belief proved untenable during the tremendous increase in work load during World War II. Millions of documents which in the past have been religiously filed and preserved had a new form of birth control clamped upon them. The resulting reduction in work loads and in personnel, filing, and equipment costs were spectacular. In the Civil Service Commission, savings reached as high as 80 percent. In several divisions of the Bureau of Naval Personnel in the Navy, savings reached as high as 30 to 40 percent. Comparable savings in the War Manpower Commission and in the Veterans' Administration were realized.

b. Discriminating application of modern office machines and equipment to record making.

Available figures of the office machine and equipment industry give factual proof that the Federal Government lags well behind private industry in the utilization of labor-saving devices in clerical operations. Efforts of the Bureau of the Budget in recent years through its business-methods program and office-equipment showings, both acknowledged this fact and attempted to do something about it. These efforts, however, have been relativley short-lived and incommensurate with the size and importance of the problem.

The sharp contrast between the utilization of microfilming equipment in the Federal Government and its use by private industry illustrates this point to a startling degree. More than 90 percent of the microfilming equipment and supplies in the Federal Government is used to reduce and preserve existing old records on 16 and 35 millimeter film and permit the destruction of bulky original records. On the other hand, more than 90 percent of the microfilming equipment and supplies in private industry is used as a record-making device. Copying and recording by microfilm instead of by hand or by other manually operated office machines is primarily a labor-saving device and only secondarily a space-saving device. To illustrate, checks passing through a bank, interline tickets and bills exchanged by transportation companies, and customer billings in retail stores are copied or recorded faster, better, and cheaper through microfilming.

c. Streamlining and reducing voluminous correspondence through the use of form letters, pattern letters, limitation or elimination of copies, pattern paragraphs, procedural guides, automatic typewriters, and other labor-saving equipment.

The massive quantities of Government correspondence is most suitable to streamlining because of the volume and the repetitive character of the subject matter. One department between 1943–45, reports a savings of 800 man-years and over \$1,000,000 in salaries and equipment through such streamlining. During the same period, the production and filing of over 2,000,000 carbon copies were eliminated. This and similar programs in a few other agencies have not only saved money but reduced backlogs, more sharply defined policies and procedures, and simplified training of personnel.

d. Controls on the development, issue, standardization and use of forms with a view to simplifying and improving forms in size, design, and function, reducing the number of forms and determining their use, methods of filing, and ultimate disposal.

The Standard Oil Co. of New Jersey estimates that it has saved one-half a million dollars a year for the last 10 years as a result of a forms control and standardization program installed in the company. Comparable savings are vouched for by other companies, and by some Federal agencies. A full program of this type cannot only simplify

and improve the size, design, and function of forms, but can also drastically reduce the number of forms, control their filing and the time and method of their ultimate disposal. The Farmers Home Administration of the Department of Agriculture has an outstanding program of this type.

e. Controls on requirements for and submission of reports, eliminating obsolete reports, unessential copies, too frequent reporting, and unessential filing of reports, coordinating all reporting to eliminate overlapping and duplication in fact gathering.

Less progress has been made by the Federal agencies in the control of reports and reporting than has been made with forms control. A few agencies have introduced a new accountability in reporting. The Department of the Army, for example, within the last 5 years eliminated 2,000 reports. Through such a program in an organization the size of the Army, a single report may be submitted by thousands of comparable organizational units. It is a commonplace that a report tends to perpetuate itself. The success of the few current reports control programs assure wide-scale benefits from their extension throughout the Government.

PROGRAM CONTENT

- 2. The minimum content of a program at the record-keeping level is:
- a. Organization of files in efficient and practical locations considering factors of physical proximity and administrative necessity, successfully eliminating widespread maintenance of duplicate files.

The rapid growth of agencies of the Federal Government has resulted in obsoleting thousands of central filing units and in the wide-spread duplication and triplication of filing operations for those central filing units which continue to satisfy an essential need. For the most part, however, a majority of the obsoleted central file units survive. Individual offices supposed to be served by such central filing units have long since established more accurate but less "official" files of their own.

It is not the purpose of this report to endorse decentralized or centralized correspondence files. It is the purpose of this report to set up machinery that will eliminate the widespread and costly duplication now existing.

The Public Health Service of the Federal Security Agency recently undertook a reorganization of its record-filing structure for, among other purposes, the elimination of duplication in files and filing. In the course of this study, 75 percent of all files were found to be fully duplicated. The initial follow-through on this study eliminated duplication costing \$18,000 a year. In a second agency, a large-scale correspondence file supposedly served many offices. Investigation revealed that 38 of these offices maintained a more complete file of their own

activities. Elimination of the duplication here resulted in a savings estimated at \$51,000 per year. These are only two illustrations of the savings that have been made and the much greater savings that can be made in this area.

b. The installation of labor-saving devices such as modern microfilming, tabulating equipment, etc., to simplify filing and the accumulation of recorded data and to reduce filing space.

Developments to date in the office-machine-and-equipment industry and impending postwar advances can slash clerical costs by performing clerical operations better and cheaper. The application of much of this equipment is increasingly varied and complex. More frequently in government than in industry the types and applications of these machines are beyond the experience of supervisors whose projects obviously require such machines and equipment. Also in government somewhat more than in industry, such machines and equipment are too often grossly misapplied.

The spectacular growth in the number and complexity of office equipment and machines demands specialized training and experience on the part of personnel responsible for appraising the application of such machines and equipment. Personnel so qualified attract substantial salaries in private industry. To attract or hold such personnel in the Federal Government will be impossible without adequate compensation.

- c. Efficient and effective work-flow patterns for mail-room and file-room installations, including effective layouts and lighting.
- d. Standards and criteria for filing systems including methods of handling, classifying, indexing, and filing records and for filing supplies and equipment.
- e. Review of requisitions for filing equipment to control purchases, allow for interchange of equipment, and to provide guidance as to the best equipment available.

Work flow, physical conditions of work, organization and procedures, and equipment control are essentials of records management or records engineering as they are of industrial and management engineering. The Department of Agriculture assumed an early lead and has sustained that lead in this area of the Federal Government. It is estimated that its coverage in the Department in this respect is 80 percent complete. The Department of the Navy dispatched teams of specialists throughout the Department and Shore Establishments during the past year for work simplification and improvement and has effected savings of more than \$1,100,000 by a reduction in personnel, space, materials, and equipment costs.

The Bureau of Federal Supply, Treasury Department, has emphasized the need for control of filing equipment purchase. The Federal Security Agency has developed a filing-equipment control system

which has reduced purchases over 80 percent. Reassignment of equipment has resulted in over 1,000 filing cabinets being provided in 6 months without new purchases. The Department of the Navy has had a long-standing program. In the past year, \$165,663 was saved in equipment and space through cancellation of filing equipment requisitions or satisfying requisitions through reassignment of equipment.

f. A training program in all phases of records management regularly being brought up to date by the addition of new developments in records management practices, equipment, and supplies.

Despite large scale expenditure of Federal funds for training, very little of these funds have been utilized for training in records management. Two outstanding exceptions are the Department of Agriculture and the Atomic Energy Commission. It is noteworthy that each of these agencies in the opinion of the records management consultants to the Commission has one of the most effective records management programs in the Federal Government.

The Atomic Energy Commission's in-service and on-the-job training in records management warrants special commendation. This program is readily expandable to all agencies of the Federal Government. One of the most constructive results of this study would be an extension of the Atomic Energy Commission program throughout the Federal Government under the sponsorship of the Federal Records Administration working through the Federal records management officers in each department and agency.

CONTROLS FOR PRESERVATION

3. Controls insuring selective records preservation.

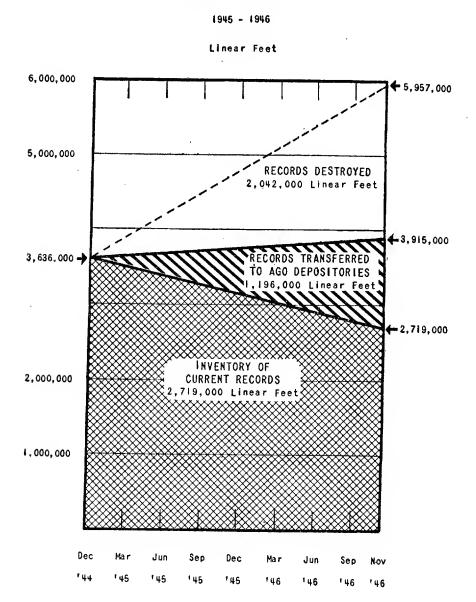
As reported in Part IV-A of this report, over 50 percent of all records in the average organization can be eliminated from office equipment and space by destruction of up to 35 percent of valueless and duplicated records and by transfers to record centers of more than 20 percent with a continuing annual turn-over of approximately 20 percent through both destruction and transfer. Chart V, page 37, geographically illustrates this fact.

Despite the tremendous expansion and scope of Army and Air Force operations in the 2 years reported, the net inventory of records in offices and operating areas actually decreased. Controls insuring selective records preservation, records disposal and records transfer cleared 54 percent of all records out of office equipment and space in a 2-year period. Adding the third year's experience, the total results were 2,534,000 feet of records, or 37.3 percent destroyed; 1,649,000 feet of records, or 24.2 percent transferred to Records centers leaving only 2,619,000 feet or 38.5 percent in current inventory of records in office equipment and space.

CHART V

Management and Disposal of Army and Air Force Records

(Excluding overseas theaters)



Elimination from Army and Air Force offices of a total of 4,183,000 feet of records released over 4,000,000 square feet of space for critical war purposes and the equivalent of 666,000 four-drawer filing cabinets with a replacement value of \$33,300,000.

The experience of the Navy and the Westinghouse Electric Corp. are comparable and sustain the findings in the Army experience. Results in many other departments and agencies, however, are by no means comparable.

Such excellent results are obtainable through:

- a. Periodic inventory of all records.
- b. Development and installation of comprehensive schedules providing for (1) prompt disposal of valueless records, (2) periodic transfer to records centers of records which need not be kept in expensive equipment and effice space, (3) periodic transfer of records of permanent historical value to the Federal Records Administration for deposit in the National Archives, (4) controls to effect record turn-over in conformance with schedules.

The millions of dollars tied up in records equipment, space, and maintenance make a records inventory as indispensable a management tool as inventories of stock and raw materials in industrial operations. An inventory of all records is essential to and the first step in a program of selective records preservation.

On the basis of the inventory, records appraisals are made and a planned program schedules records disposal and record transfers. Controls or audits have been successfully devised which insure conformance to schedules.

c. Application of microfilming to conserve space and equipment and to provide security microfilm copies of vital documents, the loss of which would seriously handican the Government.

Microfilming is an excellent adjunct to a program of selective records preservation. It greatly reduces space and equipment costs for those records which can be readily filmed and which a careful appraisal reveals must be kept for a substantial period of time. Microfilming, however, is an unsatisfactory and costly substitute for a program of selective records preservation.

Microfilming of vital records for security provides protection otherwise unobtainable for all practical purposes. Used widely to this end during the war, microfilming is again being wisely resorted to in view of the threatening situation abroad.

An experienced records management officer can and should apply microfilming to the records in his agency with discrimination and with a resulting economy and insurance.

V. SUMMARY OF SAVINGS

- 1. The most tangible result of the recommendations in this report is the prompt removal to economical and more efficient storage of a minimum of 2,000,000 cubic feet of Federal records from Federal offices, with a net and continuing yearly savings of \$6,540,000 plus an additional \$650,000 each year after the first 2 years of this program. This will release in the first 2 years space, equipment, and operational and maintenance expense conservatively appraised at \$7,660,000, or \$3.83 per cubic foot per annum. Space rental estimated at \$1.50 per square foot per annum is low. Equipment is amortized over 10 years. The cost of handling, storing, and screening this quantity of records in Federal records centers should not exceed \$1,120,000. This is based on the Navy's current costs for general records handling, storage, and screening which is 56 cents per cubic foot per annum. Costs of selected records centers in industry are as much as 20 percent lower primarily because of the lower salaries paid clerical and custodial employees in industry.
- 2. A second tangible result is the outright destruction or other disposal of a minimum of an additional 2,500,000 cubic feet of records within 2 years, with a net and continuing yearly savings of \$9,500,000. After the first 2 years, an additional savings of \$900,000 will be effected cumulatively for each year. The space, equipment, and operational and maintenance expense is discontinued in toto because the records are eliminated. The staff work applying records inventory and appraisal controls to this end would cost less than 1 percent of the savings affected and has been discounted accordingly.
- 3. A third tangible savings will result from the consolidation and reduction of existing records centers. Such savings, while substantial and important, will probably be absorbed by the cost of providing records center services for the first time to many agencies.
- 4. A fourth and the largest savings, however, will accrue from the economies and improvements effected by the development and application of controls in record making and record keeping as provided for in Part III, sections A-2 and A-C of this report. Savings already obtained in a few agencies, and therefore obtainable in many agencies where the same conditions apply, are described in Part IV, sections A-2 and C. We estimate that these savings will certainly exceed the \$16,000,000 reported in 1 and 2 above.
- 5. Equally as important as savings in excess of \$32,000,000 within 2 years with substantial additional and cumulative savings thereafter

is the certain knowledge that (a) record making and record keeping in the Federal Government will rapidly become more efficient management tools; (b) the essential records of the Government's obligations at home and abroad are safeguarded; (c) the invaluable store of experience recorded in the permanent records of our national effort to sustain democratic capitalism is accessible and can better be utilized.

APPENDIX A

There follows a draft of a proposed bill providing for the creation, preservation, management, and disposal of records of the United States Government. Such a draft is submitted for consideration and to serve in a sense as a check list of items to be included.

A Bill

Section 1. That this Act may be cited as a "Federal Records Administration Act of 1949."

Sec. 2. That when used in this Act-

(a) the word "records" includes any paper, book, photograph, motion-picture film, microfilm, sound recording, drawing, map, or other document of any physical form or character whatever, or any copy thereof, that has been made by any agency or received by it in connection with the transaction of public business and has been retained by that agency or its successor as evidence of the objectives, organization, functions, policies, decisions, procedures, operations. or other activities of the Government or because of the information contained therein. There are excluded from this definition library material acquired by an agency solely for the information and use of its staff and the public and not created or received by it incidentally to the transaction of public business; museum material acquired and preserved solely for exhibition; documents submitted for copyright; models submitted in connection with applications for patents; extra copies of documents preserved solely for convenience of reference; and stocks of publications and processed documents. Upon the request of any agency, the Federal Records Administrator shall have authority to determine whether any particular body of materials falls within this definition.

(b) the word "agency" includes every instrumentality of the Federal Government whether legislative, executive, judicial, or other.

Sec. 3. That the head of each agency shall make, cause to be made, or file only such records as in his opinion are necessary to provide for the continued effective operation of the agency of which he is the head, to constitute an adequate and proper recording of its activ-

ities and to protect the legal rights of the Government of the United States and of the people.

SEC. 4. Whoever shall willfully and unlawfully conceal, remove, mutilate, obliterate, falsify, destroy, or otherwise alienate, or attempt to conceal, remove, mutilate, obliterate, falsify, destroy, or otherwise alienate, any records made or received by any agency of the United States Government, including exhibits offered in evidence, shall, upon conviction thereof, be punished by a fine of not more than \$5,000 or by imprisonment for not more than 5 years or by both fine and imprisonment; and, if such person is an employee of the United States Government, shall moreover forfeit his office and be forever afterward disqualified from holding any office under the Government of the United States. U. S. C., Title 18, sec. 234.)

Sec. 5. It shall be the duty of the head of each agency to (a) acquaint all officials and employees under his jurisdiction with the provisions of section 4 of this Act, (b) to insure that all officials and employees turn over all records to their successors (U. S. C., Title 18, sec. 235), and (c) to establish such safeguards against removal or loss of Federal records as he shall determine necessary or as may be provided by regulations of the Federal Records Administration Council hereinafter provided.

SEC. 6. There is hereby created the Federal Records Administration, the Administrator to be appointed by the President of the United States by and with the advice and consent of the Senate.

Sec. 7. The Federal Records Administration shall establish and operate Federal records centers in Washington and in the field for the storage, servicing, security, and screening of all Federal records which must be preserved for a time but need not be retained in office

equipment and space.

SEC. 8. The Federal Records Administration shall evolve and promote Government-wide improvements and economies in records management. These improvements and economies shall include: (a) standards and controls for record making and record keeping, selective records preservation, scheduled records disposal, and transfers to records centers; (b) discriminating application of tested methods, practices, materials, equipment, and machines to record making and record keeping; (c) authorization by law to inspect Federal records and to require reports as to their management; (d) training programs directed at improving the effectiveness and the technical knowledge of personnel assigned to record making and record keeping; (e) standards and controls for physical, legal, and security safeguards of all Federal records.

SEC. 9. The Federal Records Administration shall make special provisions for preserving, studying, and servicing Federal records having permanent value and historical interest by: (a) continuing

the National Archives as an integral and vital part of the Administration; (b) continuing to maintain for this purpose an adequate professional staff of trained archivists; (c) placing such records and the professional staff under the general direction of an outstanding archivist selected in accordance with Civil Service Regulations on the basis of his professional attainments in a highly specialized field.

Sec. 10. All records belonging to the Government of the United States (legislative, executive, judicial, and other) shall be under the charge and superintendence of the Federal Records Administrator to this extent: (a) he shall have full power to inspect personally or by deputy the records of any agency of the United States Government whatsoever and wheresoever located, and it shall be the duty of the head of each agency to grant the Administrator or his deputies ready access to any or all of its records for inspection purposes and to direct any and all persons in charge of such records to cooperate with the Administrator or his deputies in such inspection; (b) he shall have full power to requisition for transfer to the Federal Records Administration any records that fall within the classes of records defined by the Federal Records Administration Council as records to be transferred to the Federal Records Administration; (c) he shall have full power to make regulations for the custody, arrangement, description, use, and withdrawal of records transferred to the Federal Records Administration:

Provided: That the head of any agency may, at the time records are transferred to the Federal Records Administration, with the approval of the Administrator, impose such restrictions on the use of records transferred from the agency of which he is the head as he may deem wise.

SEC. 11. Records of any agency, except when specifically authorized by statute or Executive order or when required in the performance of a function that has been transferred by authority of a statute or Executive order, shall not be permanently transferred or loaned for indefinite periods to another agency unless approved by the Federal Records Administrator;

Provided: That nothing herein contained shall prevent the head of any agency from furnishing records in his custody for use as evidence in courts or for use by the Congress of the United States or from loaning records in his custody to another agency for a specified period in accordance with the regulations promulgated as provided in section 17 of this Act if, in his opinion, the loan of such records is necessary or desirable.

Sec. 12. It shall be the duty of the Federal Records Administrator personally or through his duly authorized representatives to advise and cooperate with the heads of agencies or their assistants designated to serve in a liaison capacity with the Federal Records Administration

and to make available to the agencies the knowledge and experience of the Federal Records Administration in records management.

Sec. 13. It shall be the duty of the Federal Records Administrator whenever he finds that any provisions of this Act have been or are being violated to submit in writing to the head of the agency concerned a report as to conditions found and recommendations as to corrective measures. Unless corrective measures satisfactory to the Federal Records Administrator are inaugurated within a reasonable time, the Administrator shall submit a written report thereon to the President and the Congress.

SEC. 14. Statutory provisions limiting or restricting the use of records of the United States Government shall not remain in force

and effect after a period of fifty years has elapsed;

Provided: That thereafter the head of any agency having custody of such records may restrict and limit their use until such time as they have been in existence for a period of one hundred years by such regulations as, in his opinion, are desirable in the public interest or otherwise necessary, and

Provided further: That no restrictions or limitations may be imposed by any official of the United States Government on any records of the United States Government after they have been in existence for a period of one hundred years.

Sec. 15. Whenever any records, the use of which is subject to statutory limitations and restrictions, are transferred to the custody of the Federal Records Administrator, such permissive and restrictive statutory provisions theretofore applicable to the head of the agency having custody of such records and to employees thereof shall thereafter be applicable to the Federal Records Administrator and to the employees of the Federal Records Administration.

Sec. 16. Any official of the United States Government who is authorized to certify to facts on the basis of records in his custody is hereby authorized to certify to such facts on the basis of records that have been transferred by him or his predecessors to the custody of the Federal Records Administrator.

Sec. 17. A Federal Records Administration Council is hereby established superseding The National Archives Council (58 Stat. 1122 and 60 Stat. 812) and comprising the same membership as The National Archives Council with the addition of the Federal Records Administrator. The Council shall be responsible for (a) formulating regulations governing record making, record keeping, and records disposal, (b) the classes of records to be transferred to the Federal Records Administration, and (c) the use of records so transferred by public officials, scholars, and the people, (d) the loan or transfer of records from one agency to another, (e) standards governing the reproduction of records by photographic (or microphotographic) processes for the

purpose of disposing of the original records, provided that technical standards of film base, emulsion and processing, and similar technical matters shall be determined in cooperation with the Bureau of Standards.

Sec. 18. That each agency of the Federal Government shall appoint or designate a qualified records management officer to plan, develop, and organize a records management program for the agency for the purpose of effecting maximum improvements and economies in the agency's record-making, record-keeping, and selective records preservation; to cooperate with the Federal Records Administration, to use its services and facilities; and to insure conformance within the agency to the provisions of this Act and regulations of the Federal Records Administration Council.

Sec. 19. No records of the United States Government shall be destroyed or otherwise disposed of except in accordance with the regulations of the Federal Records Administration Council and with the approval of the Federal Records Administration and the Congress.

SEC. 20. Requests for authorization to destroy or otherwise dispose of records shall be submitted to the Federal Records Administrator in accordance with regulations of the Federal Records Administration Council. The Federal Records Administrator if he has no objections to the proposed records disposal shall so report to the Congress within thirty days after receipt of the request, provided the Congress is in session.

Sec. 21. It shall be the duty of the presiding officer of the Senate to appoint two Senators who with the two representatives appointed by the Speaker of the House of Representatives shall constitute a joint committee which shall examine all requests for authorization to destroy or otherwise dispose of records.

Sec. 22. A request from an agency to the Federal Records Administration for authorization to destroy or otherwise dispose of federal records shall be considered approved by the Federal Records Administration and the Congress after the lapse of forty-five days provided that the Congress is in session through the last fifteen days of the period, and provided further that neither the Federal Records Administrator nor the Congress direct that the proposed disposal or a part thereof is disallowed or that it be delayed pending further study. It shall be the duty of the Federal Records Administrator to forward such requests to the Congress within thirty days unless he recommends direct to the agency against the proposed records disposal or requests additional time to study a request.

Sec. 23. Whenever it shall appear to the Federal Records Administrator that any agency has in its custody, or is accumulating, records of the same form or character as any records of the same agency previously authorized by Congress to be disposed of, he may empower

the head of such agency to dispose of such records, after they have been in existence a specified period of time or after they have been

photographed.

SEC. 24. Records pertaining to claims and demands by the Government of the United States or against it, or to any accounts in which the Government of the United States is concerned, either as debtor, or creditor, which are required to be audited by the General Accounting Office, shall not be disposed of by the head of any agency under any authorizations granted pursuant to the provisions of this Act, until such claims, demands, and accounts have been settled and adjusted in the General Accounting Office except upon the written approval of the Comptroller General of the United States.

SEC. 25. Whenever the Federal Records Administrator and the head of any agency shall jointly determine that any of the records in the custody of that agency are a continuing menace to human health or life or to property, the Federal Records Administrator shall cause such menace to be eliminated immediately by whatever method he may deem necessary. If any records in the custody of the Federal Records Administrator are disposed of under this section, the Federal Records Administrator shall report the disposal thereof to the agency from

which they were transferred.

SEC. 26. The Federal Records Administrator shall transmit to Congress at the beginning of each regular session reports as to the records authorized for disposal under the provisions of section 25 of this Act.

SEC. 27. Photographs (or microphotographs) of any records made in compliance with regulations promulated as provided in this Act shall have the same force and effect as the originals thereof would have and shall be treated as originals for the purpose of their admissibility in evidence. Duly certified or authenticated reproductions of such photographs or microphotographs shall be admitted in evidence equally with the original photographs or microphotographs.

SEC. 28. All moneys derived by any agency from the sale of records authorized for disposal under the provisions of this Act shall be paid into the Treasury of the United States unless otherwise required by

existing law applicable to the agency.

SEC. 29. The procedures prescribed in this Act are exclusive and no records of the United States Government shall be alienated or destroyed except in accordance with the provisions of this Act.

SEC. 30. It shall be the duty of the Federal Records Administrator to notify the Attorney General of any loss, threatened or actual, by unlawful removal or destruction of Federal records that shall come to his attention. It also shall be the duty of the Federal Records Administrator to initiate through the Attorney General the recovery of Federal records which he finds to have been or believes to have been unlawfully removed from official custody.

SEC. 31. The duties imposed upon and the authority vested in the Federal Records Administrator by the provisions of this Act shall be performed and exercised in his absence or incapacity by an official of the Federal Records Administration designated by him to serve as Acting Federal Records Administrator during his absence or incapacity.

SEC. 32. Recent legislation HR 6293, Report No. 1938, 80th Congress, 2d Session, established a trust fund for receipts from photographic services rendered by The National Archives. The Federal Records Administration is hereby authorized to continue this service in accordance with the terms of HR 6293, Report No. 1938, 80th Congress, 2d Session.

Sec. 33. The National Archives Trust Fund Board (U. S. C. 300aa-300jj), the National Historical Publication Commission (48 Stat. 1122–1124), and the Franklin D. Roosevelt Library (53 Stat. 1062) shall be continued as a part of the National Archives within the Federal Records Administration. The Federal Register (44 U. S. C. 301–314) shall be continued as a unit of the Federal Records Administration.

SEC. 34. All Acts or parts of Acts inconsistent with this Act are hereby repealed.

APPENDIX B

Related Legislation

1. The National Archives Act (44 U. S. C. 301-314) as amended (44 U. S. C. 300-300k).

2. The Federal Register Act (44 U.S. C. 301-314).

3. Resolutions establishing the Franklin D. Roosevelt Library (53 Stat. 1062).

4. The National Archives Trust Fund Board (44 U. S. C. 300aa-300jj).

5. Act Governing Disposal of Records, as amended (44 U. S. C. 366-380).

6. Administrative Procedure Act (60 Stat. 237) sec. 3 and sec. 4.

7. Records of Congress (60 Stat. 833).

8. Provisions Against Loss of Records (18 U. S. C. 234–235).

9. Trust Fund for Receipts from Photographic Services (H. R. 6293, Report No. 1938, 80th Cong., 2d sess).

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